February 23, 2022

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS DEL RIO DIVISION

CLERK, U.S. DISTRICT COURT WESTERN DISTRICT OF TEXAS

By: CR

Deputy

UNITED STATES OF AMERICA	§	CAUSE NO.: DR-22-CR-00329-AM
	§	
	§	<u>INDICTMENT</u>
v.	§	
	§	[VIO: COUNT ONE: 8 U.S.C. §
	§	1324(a)(1)(A)(v)(I) & (B)(i) Conspiracy
ABRAHAM MICHAEL SIERRA (1),	§	to Transport Illegal Aliens.]
JESSICA LYNN SANDOVAL (2).	§	
	§	

THE GRAND JURY CHARGES:

COUNT ONE

[8 U.S.C. $\S 1324(a)(1)(A)(v)(I) \& (B)(i)$]

On or about January 26, 2022, in the Western District of Texas, Defendants,

ABRAHAM MICHAEL SIERRA, JESSICA LYNN SANDOVAL,

did knowingly and intentionally combine, conspire, confederate and agree with others known and unknown, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) and (B)(i).

A TRUE BILL
FOREPERSON

ASHLEY C. HOFF United States Attorney

By: _____STEPHEN KAM

Assistant United States Attorney